

EXHIBIT A

FW: Privilege Review

Sullivan, Mike

Wed 2/13/2019 4:15 PM

To: Hajjar, Tanya (USANYE) (Tanya.Hajjar@usdoj.gov) <Tanya.Hajjar@usdoj.gov>;

Cc: Penza, Moira Kim (USANYE) (Moira.Penza@usdoj.gov) <Moira.Penza@usdoj.gov>; Jones, Shannon (USANYE) 5 <Shannon.Jones@usdoj.gov>; Pilmar, Philip (USANYE) <Philip.Pilmar@usdoj.gov>; mark.lesko@usdoj.gov <mark.lesko@usdoj.gov>; jmb1219@nyu.edu <jmb1219@nyu.edu>;

Tanya thanks for the email. I am told that Ricardo Olmedo was hired for NXIVM (US) and Diego Ruiz was hired for NXIVM Mexico. I was also told that NXIVM (US) owns 99% of NXIVM Mexico. I have not been able to confirm Clare Bronfman's role at NXIVM Mexico. Thx. Mike

From: Hajjar, Tanya (USANYE) <Tanya.Hajjar@usdoj.gov>

Sent: Wednesday, February 13, 2019 1:20 PM

To: Penza, Moira Kim (USANYE) <Moira.Penza@usdoj.gov>; Sullivan, Mike <msullivan@ashcroftlawfirm.com>

Cc: Jones, Shannon (USANYE) 5 <Shannon.Jones@usdoj.gov>; Pilmar, Philip (USANYE) <Philip.Pilmar@usdoj.gov>; Lesko, Mark (USANYE) <Mark.Lesko@usdoj.gov>; Jim Brennan <jmb1219@nyu.edu>

Subject: RE: Privilege Review

Mike – Following up on our conference before Judge Scanlon on Monday, please provide us with information as to identity of the entity or individuals that retained Ricardo Olmedo of Olmedo Gaxiola & Abogados and Diego Ruiz Durán of Bufete Ruiz Durán S.C. and formerly of CLG Abogados. It is our understanding that NXIVM Mexico is a separate entity from NXIVM and, in fact, has issued several public statements clarifying that its operation and structure is “totally independent from the American corporate NXIVM.” Therefore, please let us know if any asserted attorney-client privilege belongs to Nxivm Mexico or its representatives, and what formal role, if any, Clare Bronfman had with Nxivm Mexico.

You indicated at the conference that you would be able to provide this information within 48 hours, that is, by this afternoon, so we will appreciate your prompt response.

Thanks,
Tanya

From: Penza, Moira Kim (USANYE)

Sent: Wednesday, February 13, 2019 11:24 AM

To: Sullivan, Mike <msullivan@ashcroftlawfirm.com>

Cc: Hajjar, Tanya (USANYE) <THajjar@usa.doj.gov>; Jones, Shannon (USANYE) 5 <SJones5@usa.doj.gov>; Pilmar, Philip (USANYE) <PPilmar@usa.doj.gov>

Subject: Privilege Review

Mike,

Our privilege team has identified a large number of documents that appear to be false hits based on certain search terms we've been running. We want to advise you that we are removing “l w/3 hung” from our list of terms but will still include “sidley.com”, which should identify any actually privileged materials. Additionally can you provide additional

information on “Carmen Gutierrez” and what litigation(s) she was involved in? She is not on Bronfman’s list and we are also getting a lot of hits for Rosa del Carmen Gutiérrez Ortiz. Thanks!

Moir

Moir Kim Penza | Assistant United States Attorney

U.S. Attorney’s Office, EDNY

271 Cadman Plaza East | Brooklyn, NY 11201

718.254.6454 (Direct Phone) | 718.254.6478 (Fax)

moir.penza@usdoj.gov